

195867

SALUDA NURSING CENTER

581 Newberry Highway

Post Office Box 398

Saluda, South Carolina 29138-0398

Robert F. Bowles, NHA
Administrator

Phone 864-445-2146
Fax 864-445-3119

October 31, 2008

RECEIVED

NOV 03 2008

Mr. Charles L. A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Drive, Suite 100
Columbia SC 29210

PSC SC
DOCKETING DEPT.

**Re: Rulemaking Regarding Certain Transportation Regulations, Including
Drug Testing for Passenger Carriers – Notice of Drafting Filed with the South
Carolina Legislative Council**

Docket No. 2007-445-A

Dear Mr. Terreni:

You already have received correspondence from me regarding this docket. However, I feel I must address this issue again.

SC already has regulations that address **Convalescent Transport**. They are addressed in SC Department of Health and Environmental Control, Emergency Medical Services Division, Regulation 61-7, Section 704. These regulations are sufficient. Any person who is sick enough to be in a skilled nursing facility, have 24 hour licensed nursing care, and essentially bed-ridden, needs a stretcher with EMT's accompanying them.

Most of these type patients are very elderly, in fragile condition, have multiple diagnoses, and need monitoring by a trained professional. They certainly do not need to be treated like *second class citizens* and dumped in a "two men and a truck" type vehicle, by a government for which many of them have fought, have honored with service, and to which they have paid taxes

As members of the Public Service Commission of SC, I trust that you will weigh the impact of this type of regulation on the frail, vulnerable, elderly population that needs your consideration. There is no need for new regulation. This move was an attempt by a company who is looking out for their own monetary interest. There is no concern on their part to save our state any funds. This action will be more costly to our state; not save any money.

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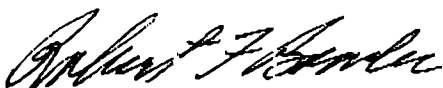
Letter to Public Service Commission

RE: **Docket No. 2007-445-A**

Any states that have this type regulation did not have what SC has in its 61-7 Regulations and their regs require certified personnel. SC does need to be mindful of its funds, but we do not need to let a company who is only interested in their own pockets to dictate to our elected officials.

Please reconsider this item: **Docket No. 2007-445-A** and **throw it out !!**

Sincerely,



Robert F. Bewles, NHA
Administrator/EMS Director

C. Wrecking Bar, minimum 24-inch (bar and two preceding items can either be separate or combined as a forcible entry tool).

D. Crowbar, minimum 48", with pinch point.

Section 704. Convalescent Transport Units.(II)

A. Convalescent transport units must meet the requirements of Section 701, minimum ambulance medical equipment, minus items C-3, H, K, M, Y.

B. Convalescent transport units are exempted from Section 703, minimum ambulance rescue/extrication equipment.

C. Convalescent transport units are required to be equipped with a radio that meets the requirements of Section 601-N (minus the PA system) whenever transporting a patient outside of its home county.

D. Convalescent transport units may not have any emergency markings, but shall display the words "Convalescent Transport" and the name of the licensee in letters a minimum of 3" in height, on each side of the ambulance.

Section 705. Special Purpose Ambulance Equipment.

A. All special purpose ambulances will be equipped with at least the following items from Section 701 of these regulations: A-1, B, C(appropriate size), D, F, G, T, U, V, W, X in addition to special purpose equipment that is documented to the Department as delineated in Section 406. Item A-1 can be replaced by a specialized patient transfer device so long as there is a provision to safely secure the device in the special purpose ambulance.

B. Special purpose equipment as documented to the Department as delineated in Section 406 of these regulations must be on the special purpose ambulance when it is in use and is subject to inventory and inspection by the Department as provided for in Section 406 of these regulations.

Section 706. EMT First Responder Equipment.

A. The First Responder Agency's vehicle must be properly marked as to identify the vehicle as an emergency vehicle.

B. The First Responder Agency will provide a minimum of one EMT-Basic for each response.

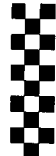
C. All first responder vehicles will be equipped with at least the following items from Section 701 of these regulations: B-2, B-3, C, D, F-1, F-3, G, H, I, J, K, L, M, N-2, N-3, O, P(3each), Q, R, S, T, W(1each), X, Y, Z, BB, CC.

D. The first responder agency must at all times be able to communicate with (a) on-line medical control, (b) dispatch center and (c) the local transporting service.

E. Equipment In Addition to 706-C To Be Carried By EMT-Intermediate First Responders.

1. Four each, 14, 16, 18 and 22 gauge IV cannulae.

2. Two Macro Drip sets.



581 Newberry Hwy.
Saluda, SC 29133

PH: 864-445-2145
FAX: 664-445-3109

SALUDA NURSING CENTER

Fax

Charles L. A. Terreni, Chief		Robert F. Bowles, NHA	
To:	Clerk/Administrator	From:	Administrator
SC Public Service Commission			
Fax:	803-396/5199	Pages:	4
Phone:		Date:	10/31/2008
Re:	Docket # 2007-445-A	cc:	
<input type="checkbox"/> Urgent <input type="checkbox"/> For Review <input type="checkbox"/> Please Comment <input type="checkbox"/> Please Reply <input type="checkbox"/> Please Recycle			